

August 12, 2013

Elizabeth Appel
Acting Director
Office of Regulatory Affairs and Collaborative Action
Bureau of Indian Affairs
U.S. Department of the Interior
1849 C Street, NW, Mail Stop 4141-MIB
Washington, D.C. 20240

**Re: Docket ID: BIA-2013-0007, RIN 1076-AF18
Request for Extension of Comment Period by the
Business Council of Fairfield County**

Dear Ms. Appel:

The Business Council of Fairfield County hereby requests a 45-day extension of the comment period for the draft revisions to the BIA tribal acknowledgement regulations in 25 CFR Part 83. The businesses we represent, and the communities that they serve, could be adversely affected if revisions are not well-considered and crafted to avoid negative outcomes. The additional time we request would make it possible for the Council to provide comments that would help the BIA achieve its goals of improving the efficiency of the tribal acknowledgment process while minimizing unintended damaging results.

The Business Council of Fairfield County was formed in 1970 by business leaders engaged in an effort to build more livable, workable communities. We are committed to maintaining and improving the economic vitality of southwestern Connecticut. We advocate for a positive business environment, work to ensure a quality business structure, and seek to create opportunities for diverse businesses to grow, develop, and locate within the region.

The Council supports efforts to ensure that legitimate applications for tribal recognition are promptly and efficiently addressed by BIA, and that applicants, as well as interested parties, are treated with respect. Tribal recognition bestows important benefits on petitioner groups, and those entities entitled to tribal recognition should not be denied access to those benefits. At the same time, BIA has a critical role as the decision maker to ensure that the benefits accorded by federal acknowledgment are preserved for legitimate tribal entities, and to screen out those who have no valid claim to tribal recognition and would take advantage of the process solely to gain access to those benefits. If BIA does not fairly and objectively fulfill this role, its authority to administer the tribal acknowledgement process must be called into question considering the lack of any clear delegation of power from Congress to the Executive Branch for this purpose.

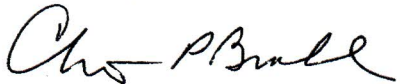
Entities that are acknowledged as tribes can take land into trust, exercise sovereign powers, open casinos in some states, and undertake other actions that have major impacts on the local

governments, private landowners, and the business community. It is critically important that BIA maintain a fair and objective process in making such decisions.

Given how important these issues are, and in light of the complex proposed revisions to Part 83, we cannot provide meaningful comments within the current review period. Our organization is very familiar with the Part 83 process as a result of our participation in the BIA review of several petitioner groups located in Connecticut. BIA correctly determined that those petitioners did not meet the requirements for federal acknowledgement, and the Council is deeply concerned that the proposed revisions would reopen those petitions under greatly relaxed criteria that do not afford an adequate opportunity for participation by interested parties. Only by having additional time to consider the proposal can the Council provide fully-informed and meaningful comments. We are confident that by affording more time for submission of comments, BIA will be in a far better position to promulgate fair and effective regulations that meet the needs of all concerned.

Thank you for considering this request.

Very truly yours,

A handwritten signature in black ink, appearing to read "Chris P. Bruhl", written in a cursive style.

Christopher P. Bruhl
President & CEO

cc: Secretary of the Interior Sally Jewell
Assistant Secretary for Indian Affairs Kevin Washburn
Connecticut Congressional Delegation
Governor Daniel Malloy
Attorney General George Jepsen